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Tetra Tech EM Inc.

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MONTANA OFFICE

Ms. Susan Zazzali
U. S. Environmental Protection Agency
301 S. Park
Federal Building Drawer 10096
Helena, Montana 59626-0096

**Subject: Comments on Draft Statement of Work for the East Helena Supplemental Environmental Project, ASARCO East Helena Smelter
REPA Contract No. 68-W4-0004, Work Assignment No. R08024**

Dear Ms. Zazzali:

At your request, Tetra Tech EM Inc. (EMI) has reviewed the Draft Statement of Work for the East Helena Supplemental Environmental Project (SEP) to determine if the work proposed will interfere with the Resource Conservation and Recovery Act (RCRA) facility investigation (RFI) at the facility, or if the upcoming RFI will damage or undo the revegetation of the area covered by the SEP. After conducting this review, EMI has the following comments.

1. Historic sampling results of soils in portions of the area covered by the SEP indicate elevated levels of metals including arsenic and lead (Hydrometrics 1994). However, it is not clear if these data accurately reflect current conditions because these areas have been disturbed during remedial actions conducted around Lower Lake. Prior to implementing either phase 1 or phase 2 of the SEP, potential contaminated soils in the area of the SEP should be identified and remediated, if necessary. Soil sampling could be conducted as part of the baseline vegetation and wildlife measurements planned as part of the SEP data collection plan. Soil removal criteria should also be developed.
2. At this time and prior to conducting the RFI, the scope of the RFI in the areas surrounding Lower Lake and Upper Lake is unknown. Additionally, if the RFI indicates that certain remediation efforts are required in this area, portions of the reclaimed areas constructed as part of the SEP could be disrupted. It may be helpful to conduct a focused review of current conditions in this area, including any additional baseline analytical data collected by ASARCO, prior to implementing the SEP in order to identify potential conflicts.

A copy of these comments has been sent to you via electronic-mail in WordPerfect 6.1. Please call me at (406) 442-5588 if you have any questions or require further assistance.

Sincerely,

Brian Antonioli, P.E.
Project Manager

Attachment

cc: EMI file

REFERENCES

Hydrometrics. 1994. "Pre-Final (90%) Design Report, Lower Lake Remediation Project for the ASARCO East Helena Plant." Prepared for ASARCO, Inc. March.